

Your
Seattle
City Light

Memorandum



F 747.4
805
980.6
UP/IR

DATE : July 7, 1980

TO : J. Fletcher

FROM : T. Miller Original Signed by
T. R. MILLER

SUBJECT : Lake Union Steam Plant
Light Oil Storage & Service Tanks
(P.C.B.) Polychlorinated Biphenyls

The oil stored in the subject tanks was tested for PCB last March. The report received from Laucks Testing Laboratories, Inc. (copy attached) shows only ~~1~~ 1 part per million of PCB's. Present regulations permit burning oil with a PCB content of less than 50 parts per million.

~~In the past, we understand, some transformer oil has been burned in the boilers at Lake Union. We recommend this practice be discontinued and only number 1 fuel oil be used for start-up. There are two good reasons for this. They are as follows:~~

1. Transformer oil is selected for its ability to resist deterioration due to heat and has a very high flash point. In contrast ~~to fuel oil, which is much more volatile and has a lower flash point.~~
2. All transformer oils are not the same. Some oils contain more PCB's than others. The only sure method of determining the PCB content of a particular transformer oil is to have it tested in a laboratory. Even if the oil tested out at below 50 ppm PCB's there still would be a problem in storing it in tanks near the lake. Recently, some of the oil stored in the tanks at Lake Union leaked out into the lake. The Environmental Protection Agency proposals are to keep PCB levels in Lakes and rivers below 0.01 part per billion. This is a much lower concentration than the 50 ppm. According to Neil Thompson of the Environmental Protection Agency, all transformer oil is assumed to contain PCB's and must be tested before disposal. It is illegal to dilute transformer oil containing over 50 ppm with other fuel oil.

If you require additional information on this matter, please let us know.

GPG:zs

Attachment: Test Results

cc: Peha* Miller/Sihon
Naud* Sundquist
B. Riley* Groner
Willing* File
D. Anderson*

* with attachment

Laucks

Testing Laboratories, Inc.

1008 Western Avenue, Seattle, Washington 98104 (206) 622-0727

Chemistry, Microbiology and Technical Services



Certificate

CLIENT Seattle City Light
1015 Third Avenue
Seattle, WA 98104
Attn: Blanche Samuels

LABORATORY NO. 69542

DATE March 11, 1980

REPORT ON TRANSFORMER OIL

SAMPLE
IDENTIFICATION

Submitted on 3-7-80

TESTS PERFORMED
AND RESULTS:

PCBs, mg/kg ----- 1
(parts per million)

RESPECTFULLY SUBMITTED,
Laucks Testing Laboratories, Inc.



JMO:ks

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